COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

1	n	tŀ	A	M	la	tt	۵r	O.	f٠
3		ŁI	163	IV	$\boldsymbol{\alpha}$	LI	7		

APPLICATION OF EAST KENTUCKY POWER)	
COOPERATIVE, INC. FOR APPROVAL TO)	CASE NO.
ENTER INTO A THREE-YEAR PURCHASED)	2011-00125
POWER AGREEMENT WITH AMEREN)	
ENERGY MARKETING COMPANY	j	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. ("East Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. Responses are due no later than seven days from the date of this Order. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

East Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which East Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Refer to the Amended Application, Exhibit 2, P. 1 of 6 (Revised). Provide a detailed explanation of the terms "AD Hub" and "South Export delivery point," including their respective physical locations.
- 2. Provide a schedule similar in form to that in Exhibit 2, P. 5-6 (Revised) showing a cost comparison of the Base Case and a three-year contract to purchase 50 MW of power at the AD Hub for \$41/MWh. The schedule should show separately the \$2/MW transmission congestion cost and the net savings.
- 3. Is \$41/MWh still the current market price for the proposed purchase of 50 MW for three years? If not, state what the current market price is and provide the cost comparison schedule requested in Item 2, above, utilizing the Base Case and the new current market price.

4. Provide East Kentucky's most recent forecast by year through 2025 of its seasonal peak demands, seasonal reserves required, seasonal required capacity, seasonal existing capacity, seasonal capacity surplus or deficit, annual total energy requirements, annual energy available from existing generation, and annual energy surplus or deficit. Also provide the dates that this most recent forecast was prepared and approved by the Board of Directors.

Jeff Derouen

Executive Director

Public Service Commission

P. O. Box 615

Frankfort, KY 40602

DATED: 0CT 14 2011

cc: Parties of Record

Roger Cowden Frost Brown Todd LLC 250 West Main Street, Suite 2800 Lexington, KENTUCKY 40507-1749